

REMARKS

Claims 1 - 18 are pending in the present application. By this Amendment, claims 1, 2, 4 – 6 and 8 - 10 have been amended. No new matter has been added. It is respectfully submitted that this Amendment is fully responsive to the Office Action dated January 15, 2005.

As To The Merits:

As to the merits of this case, the Examiner sets forth the following rejections:

- 1) claims 1, 4, 5, 11, 12, 13 and 16–18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ebert (U.S. Patent No. 6,278,991);
- 2) claims 2, 6, 10 and 14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ebert in view of Downs et al. (U.S. Patent No. 6,070,176); and
- 3) claims 3, 7, 8, 9 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ebert in view of Rosin et al. (U.S. Patent No. 6,295,057).

Each of these rejections is respectfully traversed.

Independent claim 1 calls for *link setting means for setting, on the basis of said acquired position information, a link between an m-th object and an n-th object when only said n-th object exists in a predetermined direction with reference to said m-th object, said link setting means alternatively setting a link based on a distance of each object from said m-th object in said predetermined direction when a plurality of objects exist in said predetermined direction with reference to said m-th object.*

Similarly, independent claims 11, 16 and 18 each call for *first processing for setting a link between an m-th object and an n-th object when only said n-th object exists in a predetermined direction with reference to said m-th object; and second processing for setting a link based on a distance of each object existing in a predetermined direction from said m-th object when a plurality of objects exist in said predetermined direction with reference to said m-th object.*

In the Action, the Examiner takes the position that Ebert discloses in column 9, lines 24 – 31 and lines 54 – 59 the features of the present claimed invention regarding setting a link between an m-th object and an n-th object when only the n-th object exists in a predetermined direction with reference to said m-th object.

However, the Examiner is mischaracterizing the teachings of Ebert. That is, according to Ebert:

In a preferred embodiment, a user may create hierarchies for the links graphically represented on user favorites screen 50. For example, a cluster object link, such as cluster object link 60, 62, or 64, may be created by clicking on button 86. The user may also type in a name for a cluster object link (such as the name "Workbooks" given to cluster object 60). In the example on user favorites screen 50, cluster object link 60 is one hierarchical level above object links 70, 72, 74 and is also linked to them.¹

In a preferred embodiment, user favorites screen 50 may be saved (e.g., stored on a server and/or on computer-readable storage media) in such a way that the user-specified relative positions of the graphical representations of object links and cluster object links as they appear on user favorites screen 50 are also saved.²

¹ Please see, lines 24 - 31, column 9 of Ebert.

² Please see, lines 54 – 59, column 9 of Ebert.

That is, while Ebert may disclose creating cluster object links and user-specified relative positions of the graphical representations of object links and cluster object links, Ebert fails to teach that when only an n-th object exists in a predetermined direction with reference to a m-th object a link is created between the two.

In other words, Ebert fails to disclose the features of the claimed invention concerning *setting a link between an m-th object and an n-th object when only said n-th object exists in a predetermined direction with reference to said m-th object*

Moreover, Ebert discloses that “a link is created between a cluster object link, such as cluster object link 60, and one or more object links, such as object links 70, 72, 74, by using a mouse to drag the graphical representations of object links 70, 72, 74 to the graphical representation of cluster object link 60.”³

Based on this disclosure, it is clear that Ebert fails to disclose the features of the claimed invention concerning *setting a link based on a distance of each object existing in a predetermined direction from said m-th object when a plurality of objects exist in said predetermined direction with reference to said m-th object.*

That is, Ebert is not concerned with setting a link based on the distance of n-th objects in a predetermined direction from an m-th object, since instead Ebert creates a link by merely

³ Please see, lines 32 - 37, column 9 of Ebert.

dragging the graphical representation of an object link to the graphical representation of the cluster object link.

In other words, none of the references cited by the Examiner teach nor suggest the gist of the present invention that links can be dynamically and automatically created in a cross (+) direction from an arbitrary object based on its coordinates of representation (two-dimensional). Such a feature provides the following remarkable advantage. That is, it is possible to automatically determine visual move destinations among displayed object groups without requiring link information due to relation of contents, etc.

Specifically, the present invention does create a link tree so as to display object, but features to dynamically determine crosswise (+) move destination through geometric computations using positional coordinates of displayed objects (without any two-dimensional move destination information).

In contrast to this, none of the cited references disclose nor teach any method of visually determining move destinations, and hence the inventor believes that all cited references, even if combined all together, can never achieve a link tree as claimed in the present invention.

In view of the aforementioned amendments and accompanying remarks, Applicant submits that the claims, as herein amended, are in condition for allowance. Applicant requests such action at an early date.

If the Examiner believes that this application is not now in condition for allowance, the Examiner is requested to contact Applicant's undersigned attorney to arrange for an interview to expedite the disposition of this case.

If this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. The fees for such an extension or any other fees that may be due with respect to this paper may be charged to Deposit Account No. 50-2866.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'TEB', is written over the printed name of Thomas E. Brown.

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